



June 2022

MILITARY CHILD CARE

Coast Guard is Taking Steps to Increase Access for Families

Accessible Version

GAO Highlights

Highlights of [GAO-22-105262](#), a report to congressional committees

Why GAO Did This Study

To help personnel balance work and family life, the Coast Guard provides child care programs—both on-base and in communities where their personnel live—similar to those offered through DOD. Military families, like others, struggle to find child care for a variety of reasons, such as a limited number of providers and the high cost of care.

The William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 includes a provision for GAO to report on child care and school-age care programs available to qualified Coast Guard families and how these compare to DOD's programs.

This report examines how the Coast Guard (1) compares to DOD in providing access to child care for its personnel, and (2) is working to increase access to quality child care through its programs.

GAO analyzed data from the Coast Guard's and DOD's child care programs, including Fee Assistance program data from March 2022 (the most recent available) and Child Development Center and Family Child Care data from 2019 (for consistency with data previously reported by DOD). GAO also reviewed agency documentation and interviewed agency officials.

View [GAO-22-105262](#). For more information, contact Kathryn A. Larin at (202) 512-7215 or larink@gao.gov.

June 2022

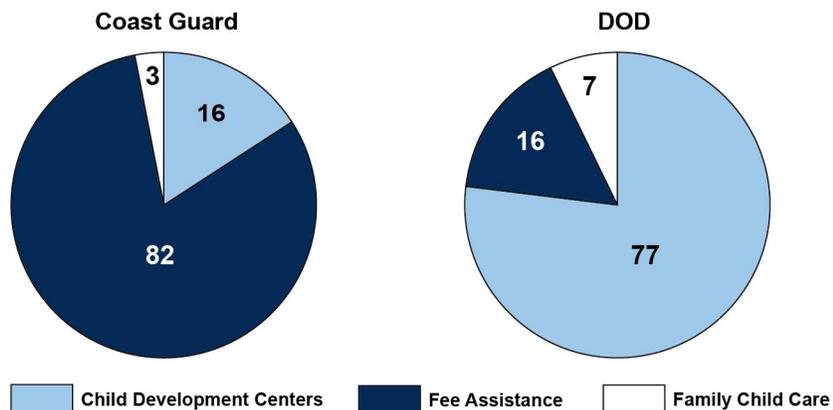
MILITARY CHILD CARE

Coast Guard is Taking Steps to Increase Access for Families

What GAO Found

Compared to the Department of Defense (DOD), the U.S. Coast Guard (Coast Guard) operates proportionally fewer on-base child development centers, so most eligible Coast Guard personnel receive fee assistance to help them obtain child care through community-based providers. According to GAO's analysis of agency data, the Coast Guard serves 82 percent of enrolled children through community-based providers who participate in its Fee Assistance program. In contrast, DOD serves 77 percent of enrolled children in its on-base child development centers (see figure). Most DOD and Coast Guard child development centers have waitlists and as of March 2022, the Coast Guard and DOD reported having 361 and 14,034 children, respectively, on waitlists; most of these children were infants and toddlers. Families enrolled in Fee Assistance programs, like many families seeking child care, may face challenges obtaining care when there are limited spaces available at community-based providers in their area. A third, less-used program that DOD and Coast Guard offer is the Family Child Care program in which military families provide in-home child care to their children and children of other military families.

Percentage of Enrolled Children by Type of Coast Guard and Department of Defense (DOD) Child Care Programs



Source: GAO analysis and summary of Coast Guard and DOD data. | GAO-22-105262

Accessible Data for Percentage of Enrolled Children by Type of Coast Guard and Department of Defense (DOD) Child Care Programs

	Coast Guard	Department of Defense
Child Development Centers	16	77
Fee Assistance Program	82	16
Family Child Care	3	7

Source: GAO analysis and summary of Coast Guard and DOD data. | GAO-22-105262.

Note: Due to rounding, the percentage of children enrolled in Coast Guard programs adds up to more than 100 percent. Child Development Center data are from 2019 and include children in school-age programs. Fee Assistance data are from 2022, and Family Child Care data are from 2019. Because of the disruption that the COVID-19 pandemic had on child care services and programs in 2020, GAO did not review data from that year.

The Coast Guard is working to increase access to quality child care by planning facility improvements and centralizing information for families. In a March 2022 report to Congress, the Coast Guard stated that it plans to build four new child development centers and to renovate existing ones, which will provide access to on-base child care for more families. The Coast Guard has also centralized and updated online information to help families find child care in their communities. In addition, the Coast Guard increased Fee Assistance subsidy amounts to help make child care more affordable, especially for families who live in high-cost areas.

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Abbreviations

CDC	Child Development Center
Coast Guard	United States Coast Guard
DOD	Department of Defense
GSA	General Services Administration
MCCYN	Military Child Care in Your Neighborhood
Needs Assessment	2020 Needs Assessment, Child Care Report
NAEYC	National Association for the Education of Young Children

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June 30, 2022

The Honorable Maria Cantwell
Chair
The Honorable Roger F. Wicker
Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate

The Honorable Peter A. DeFazio
Chairman
The Honorable Sam Graves
Ranking Member
Committee on Transportation and Infrastructure
House of Representatives

The U.S. Coast Guard (Coast Guard), one of the six military branches, resides within the Department of Homeland Security and is responsible for maritime safety, security, and environmental stewardship in U.S. ports and inland waterways. The Coast Guard's workforce includes approximately 56,000 active duty, reserve, and civilian personnel. To support its personnel in balancing work and family life, the Coast Guard provides child care programs, both on-base and in local communities, that are similar to those offered through the Department of Defense (DOD). These include:

1. Child Development Centers (CDC) which offer child care in on-base centers;
2. Fee Assistance programs which provide financial subsidies to help active duty personnel offset the cost of care in their communities; and
3. Family Child Care programs which offer military families the opportunity to provide child care in their homes.

Military families, like others, struggle to find child care for a variety of reasons, such as a limited number of child care providers and the high

cost of care.¹ Paying for child care is especially challenging for families with younger or multiple children and who live in communities with a high cost of living. Moreover, due to the nature of their work, military families often have specific child care needs that can be hard to meet. For example, military personnel may have to work duty shifts with early or late hours or on weekends or may have to find a child care provider after moving to a new duty station. Nationwide, child care industry challenges have been further complicated by the COVID-19 pandemic.²

Section 8231 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 includes a provision for GAO to report on child care and school-age care options available to qualified Coast Guard families and how those compare to the options provided by DOD to qualified families of the other military branches.³

This report examines how the Coast Guard (1) compares to DOD in providing access to child care for its personnel, and (2) is working to increase access to quality child care through its programs.

We used several methods to address these objectives. To compare how the Coast Guard and DOD provide access to child care for their personnel, we summarized and analyzed data from the Coast Guard's and DOD's child care programs, including data on enrollment, capacity, and waitlists. Data from 2019 on DOD's CDC and Family Child Care programs were published in DOD's *Report to the Congressional Defense*

¹National Center on Early Childhood Quality Assurance (2020). *Addressing the Decreasing Number of Family Child Care Providers in the United States*. (Washington, D.C.: Office of Child Care); National Academies of Sciences, Engineering, and Medicine (2018). *Transforming the Financing of Early Care and Education*. (Washington, D.C.: The National Academies Press); DOD, *Report to the Congressional Defense Committees on Department of Defense Child Development Programs* (Washington, D.C.: Sept. 5, 2020). In addition, the number of family child care providers, who provide care in their homes and generally cost less than center-based child care, has steadily decreased over time, making it even more difficult for families to find affordable care.

²Based on our 2021 national survey of state Child Care and Development Fund administrators, we previously reported that COVID-19 notably impacted the availability of child care for families due to closure of facilities, although states reported improvements in availability over time. GAO, *COVID-19: Additional Actions Needed to Improve Accountability and Program Effectiveness of Federal Response*, [GAO-22-105051](#) (Washington, D.C.: Oct. 27, 2021).

³Pub. L. No. 116-283, tit. VI, § 629, 134 Stat. 3388, 3680 (2021). We included data on DOD and Coast Guard school-age care in our analysis of child development centers. Coast Guard officials told us they serve very few school-age children in their CDCs.

*Committees on Department of Defense Child Development Programs, 2020.*⁴ We analyzed DOD data from this report and, for consistency, analyzed Coast Guard data from 2019 on its CDC and Family Child Care programs. With regard to the Coast Guard's Fee Assistance program, because of a transition in the program administrator and associated data reliability concerns with 2019 program data, we analyzed Fee Assistance program data from March 2022 (the most recent data available) from DOD and Coast Guard. We assessed the reliability of these data by interviewing Coast Guard and DOD officials and conducting data testing. We determined these data were sufficiently reliable for the purpose of summarizing data on the Coast Guard's and DOD's child care programs.

In addition, we reviewed selected child care requirements established by the Coast Guard and DOD as well as reports from the National Center on Early Childhood Quality Assurance which describe states' requirements. Specifically, we reviewed:

- Coast Guard's *Commandant Instruction M1754.15, Child Development Services*;
- DOD's *Instruction 6060.02 Child Development Programs*; and
- National Center on Early Childhood Quality Assurance's *Trends in Child Care Licensing Requirements and Policies for 2017, Research Brief 1* and *Research Brief 2*.⁵

To examine how the Coast Guard is working to increase access to quality child care through its programs, we reviewed and interviewed Coast Guard officials about the Coast Guard's *2020 Needs Assessment, Child Care Report (Needs Assessment)*.⁶ The Coast Guard conducted the Needs Assessment to evaluate and understand the child care challenges

⁴Because of the disruption that the COVID-19 pandemic had on child care services and programs in 2020, we did not review data from that year.

⁵Coast Guard Commandant Instruction M1754.15, *Child Development Services* (Apr. 2, 1996). Department of Defense Instruction 6060.02 *Child Development Programs*. (Aug. 5, 2014) (incorporating change 2 effective Sept. 1, 2020). National Center on Early Childhood Quality Assurance (2020). *Research Brief #1: Trends in Child Care Center Licensing Requirements and Policies for 2017*, Washington, D.C.: Office of Child Care; and National Center on Early Childhood Quality Assurance (2020). *Research Brief #2: Trends in Family Child Care Home Licensing Requirements and Policies for 2017*, Washington, D.C.: Office of Child Care.

⁶Coast Guard, *2020 Child Care Needs Assessment Final Report* (Washington, D.C.: Nov. 2020).

facing its personnel and to determine the effectiveness of Coast Guard programs and policies.⁷ The Needs Assessment included results from site visits to 10 Coast Guard locations and a web-based survey of Coast Guard personnel. It also included an analysis of child care supply and affordability in 25 locations selected to represent different geographic regions and areas where Coast Guard personnel live.

To inform both of our objectives, we interviewed and obtained written information from officials who oversee child care programs in the Coast Guard's Office of Work-Life and DOD's Office of Military Family Readiness Policy. We also reviewed relevant federal laws and related reports from GAO and the Congressional Research Service.

We conducted this performance audit from May 2021 to June 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

To assist families with child care so they can support the mission of the Coast Guard, the Coast Guard offers three main child care programs (see table 1):

1. Child Development Centers (CDC), on-base care in centers;
2. Fee Assistance Program (also known as Military Child Care In Your Neighborhood), subsidies for active duty personnel to help pay for care by community-based providers; and
3. Family Child Care, care provided by individuals certified by the Coast Guard and who reside in Coast Guard-controlled housing (typically,

⁷Section 8233 of the William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021 includes a provision for the Coast Guard to assess the child care needs of its personnel in fiscal years 2021, 2022, and 2023. Pub. L. No. 116-283, tit. VI, § 629, 134 Stat. at 4662-63.

this care is provided by Coast Guard families for other Coast Guard families).⁸

In addition to these programs, Coast Guard personnel may enroll their children in DOD installation-based child care programs.⁹

Table 1: Overview of Coast Guard Child Care Programs

	Program Description	Eligibility	Order of Priority
Child Development Centers	Provides child care services at centers located on Coast Guard bases. Hours of operation vary based on various factors, including traditional duty hours of the location	Dependent children of Coast Guard military personnel, civilian employees, other military personnel, federal employees living or working at or near the unit, and members of the civilian community	<ol style="list-style-type: none"> 1. Single parents, whether active duty or civilian Coast Guard and Department of Homeland Security (DHS) employees 2. Other DHS parents, active duty Coast Guard or civilian employees 3. Active duty Department of Defense (DOD) parents 4. Civilian parents employed by DOD or other federal agencies 5. DHS contractors 6. Community Members
Fee Assistance Program	Provides a subsidy to Coast Guard families to help offset child care costs for care in their communities. Subsidy amounts are based on personnel paygrade, type of care, locality, and cost of care ^a	Active Duty and Active Duty Reserve personnel ^b	All eligible members receive fee assistance subsidies
Family Child Care	Provides child care for 10 hours or more a week in Coast Guard-controlled housing	Dependent children of Coast Guard military personnel, civilian employees, other military personnel, federal employees living or working at or near the unit, and members of the civilian community	While providers may accept children at their discretion, those who live in Coast Guard-controlled housing must prioritize Coast Guard children over others.

Source: GAO summary of Coast Guard's documentation and interviews with Coast Guard officials. | GAO-22-105262.

⁸The Coast Guard's Office of Work-Life administers these programs, advises personnel regarding child care resources, and provides referrals to community-based providers.

⁹Department of Defense Instruction 6060.02 *Child Development Programs*. (Aug. 5, 2014) (incorporating change 2 effective Sept. 1, 2020). The Coast Guard is required to reimburse DOD for Coast Guard children enrolled in DOD child care programs. Coast Guard families have the same priority as their DOD counterparts to DOD child care services. Department of Homeland Security, Coast Guard, *Memorandum of Understanding between United States Coast Guard and the Department of Defense*. (Washington, D.C.: Sept. 26, 2014).

^aAccording to Coast Guard officials, fee assistance subsidies are subject to a market cap based on locality. As of August 2019, in high-cost areas, subsidies are capped at \$1,200 for full-time care, and \$600 for part-time care, per month per child. In basic cost areas, full-time care subsidies are capped at \$900, and part-time care is capped at \$450 per month per child.

^bActive Duty Coast Guard Personnel and Reservists on Active Duty Orders for at least 180 days. If the Coast Guard member is married, his or her spouse must be employed a minimum of 20 hours a week, actively seeking employment, or enrolled in higher-education coursework.

DOD offers the same three child care programs to its personnel. Each service branch—Army, Navy, Air Force, and Marine Corps—manages its child care programs and is supported by DOD’s Office of Military Family Readiness Policy, within the Office of the Deputy Assistant Secretary of Defense for Military Community and Family Policy.¹⁰

According to the Coast Guard and DOD, military child care programs are funded with a combination of appropriated funds and families’ child care payments. Coast Guard and DOD officials told us that appropriated funds may be used for a variety of expenses such as maintenance and repairs in CDCs as well as for Fee Assistance subsidies and administrative costs associated with managing the CDC and Fee Assistance programs. Families’ child care payments help fund salaries and benefits for CDC direct care staff members.

Like their civilian child care counterparts, Coast Guard child care centers, including family child care providers, are subject to oversight which includes certification by the Coast Guard, state licensing or national accreditation (see table 2).

- Coast Guard certification or approval helps ensure operations meet Coast Guard standards. For example, the Coast Guard’s certification of its CDCs includes an assessment to determine if the CDC is in compliance with federal law and Coast Guard standards and procedures, among other things. Based on the findings of the assessment and a completed plan of action, the Coast Guard issues the CDC a certificate to operate.
- State licensing of child care providers helps protect children from harm such as the spread of disease, building safety hazards, injury, and developmental impairment from the lack of healthy relationships with adults. Child care licensing is a process administered by state

¹⁰GAO, *Military Child Care: Off-Base Financial Assistance and Wait Lists for On-Base Care*, [GAO-21-127R](#) (Washington, D.C.: Dec. 1, 2020).

and territory governments that sets a baseline of requirements for child care programs to operate legally.¹¹

- National accreditation of child care providers helps ensure that programs are safe, well prepared, and intentional about children’s success. National child care accreditation organizations evaluate providers on standards related to, for example, curriculum, teaching, health, staff competencies, leadership and management, physical environment, and relationships between teachers, children, parents, and communities.¹²

Table 2: Overview of Coast Guard Child Care Program’s Certification, Licensing, and Accreditation Requirements

Program	Coast Guard Certification or Approval	State Licensing	National Accreditation
Child Development Centers	Certified to operate by the Coast Guard	Exempt from state child care licensing requirements	Requires accreditation by the National Association for the Education of Young Children (NAEYC) ^a
Fee Assistance Program	Approved by the Navy in its capacity as administrator of the Coast Guard’s Fee Assistance program. Navy reviews and approves provider applications.	Licensed in the state in which they operate, or able to provide proof of a religious or state exemption	Not required to be nationally accredited ^b
Family Child Care	Coast Guard certified or licensed in the state where they operate when state standards are more stringent	Coast Guard certified or licensed in the state where they operate when state standards are more stringent	Not required to be nationally accredited

Source: GAO summary of Coast Guard’s documentation and interviews with Coast Guard officials. | GAO-22-105262.

Note: Child Development Centers are on-base child care centers. Fee Assistance programs provide subsidies to help military families pay for care provided by community-based providers, and Family Child Care is care provided by military families in their homes which are owned by the military.

^aNAEYC is a professional membership organization that promotes high-quality early learning for all young children, birth through age 8, by connecting early childhood practice, policy, and research.

^bAccording to NAEYC, achieving national accreditation demonstrates that the provider has been measured by the most rigorous national standards in the areas of education, health and safety. This process includes, among other things, self-study, training, and an accreditation site visit.

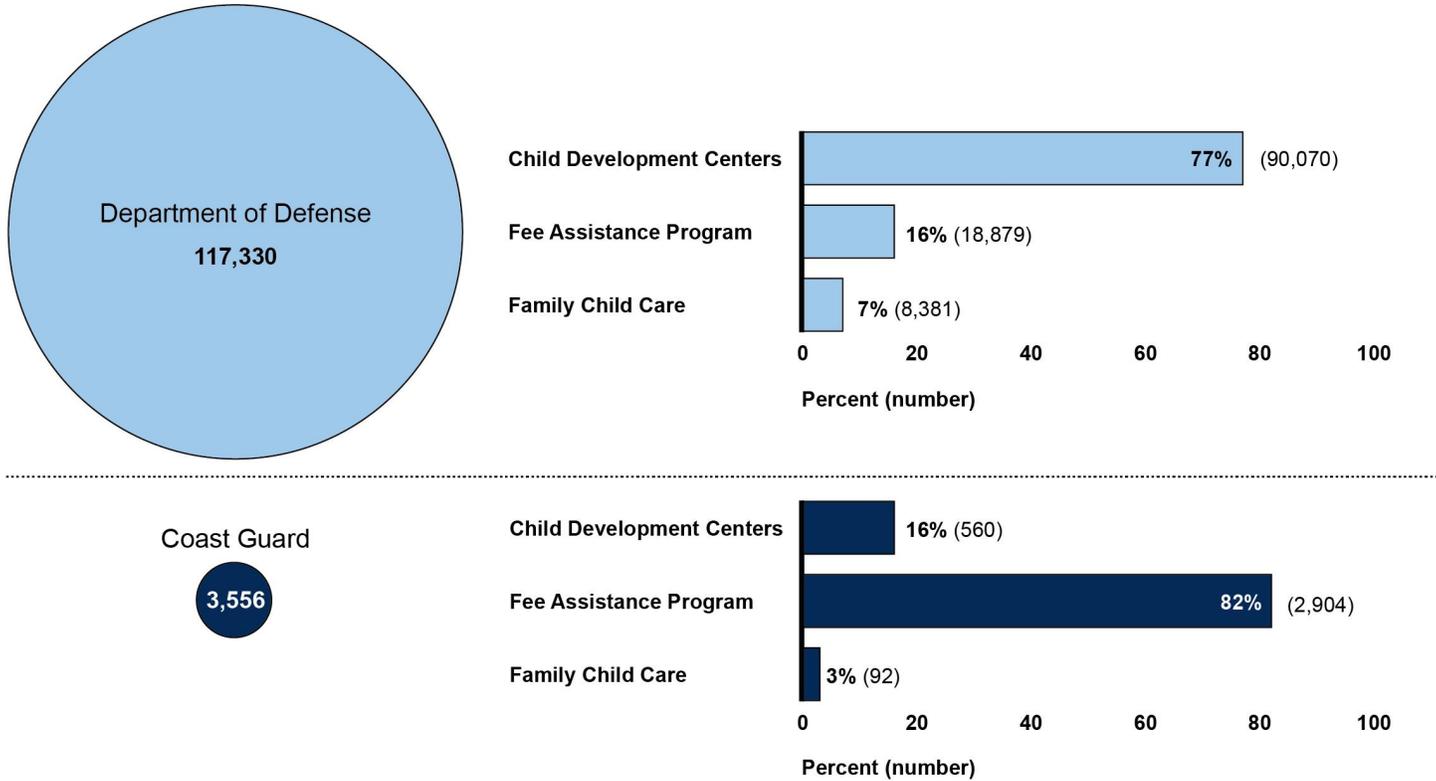
¹¹Department of Health and Human Services, *National Database of Child Care Licensing Regulations*. Washington D.C. 2022. Accessed April 27, 2022. <https://licensingregulations.acf.hhs.gov/about>.

¹²National Association for the Education of Young Children (NAEYC). *The 10 NAEYC Program Standards*. Accessed April 25, 2022. <https://www.naeyc.org/our-work/families/10-naeyc-program-standards>.

Compared to DOD, the Coast Guard Has Proportionately Fewer Child Development Centers so Most Eligible Personnel Use Community-Based Providers

Taking into account the vast size difference between DOD and the Coast Guard, the Coast Guard has proportionately fewer on-base CDCs to serve the population of children enrolled in Coast Guard child care programs. Most CDCs have waiting lists, particularly for infant and toddler care, due to capacity limitations and high demand, according to agency officials. According to our analysis of agency data, compared to DOD, a higher percentage of Coast Guard children of eligible personnel receive care through community-based providers in the Fee Assistance Program, as shown in figure 1. However, military families may still face challenges finding care due to a limited number of spaces in community-based child-care centers. Additionally, the Coast Guard, like DOD, has experienced a significant decrease in the number of Family Child Care providers, which has led to fewer families being able to use this type of care.

Figure 1: Number and Percentage of Children Enrolled in Coast Guard and Department of Defense (DOD) Child Care Programs, Including School-Age Care



Source: GAO analysis and summary of Coast Guard and DOD data. | GAO-22-105262.

Accessible Data for Figure 1: Number and Percentage of Children Enrolled in Coast Guard and Department of Defense (DOD) Child Care Programs, Including School-Age Care

	Department of Defense	Coast Guard
Child Development Centers	77% (90,070)	16% (560)
Fee Assistance Program	16% (18,879)	82% (2,904)
Family Child Care	7% (8,381)	3% (92)
Total	117,330	3,556

Source: GAO analysis and summary of Coast Guard and DOD data. | GAO-22-105262.

Note: Due to rounding, the percentage of children enrolled in Coast Guard programs adds up to more than 100 percent. Fee Assistance programs provide subsidies to help military families pay for care provided by community-based providers. Child Development Centers (CDCs) are on-base child care centers, and Family Child Care is care provided by military families in their homes. GAO included data from 2019 on DOD's child development center and family child care programs that were published in DOD's *Report to the Congressional Defense Committees on Department of Defense Child Development Programs, 2020* (Washington, D.C.: Sept. 5, 2020). Because of a transition in the program administrator for the Coast Guard's fee assistance program and associated data reliability concerns with 2019 fee assistance program data, we analyzed data from March 2022, the most

recent data available, from DOD and Coast Guard for the child care fee assistance programs. While the percentage of children enrolled in DOD and Coast Guard child care programs may vary depending on when the data were collected, GAO determined the data included in this analysis were sufficient for this report. CDC enrollment data include children in school-age care.

Child Development Centers (CDCs)

The Coast Guard has fewer on-base CDCs and therefore less capacity to serve children in its on-base CDCs than DOD. The Coast Guard reported having capacity to serve up to 704 children in its nine CDCs, while DOD reported a total capacity of approximately 104,000 children in 761 CDCs.¹³ Compared to DOD, the Coast Guard has a smaller budget and fewer personnel to operate CDCs, which are expensive to construct and maintain.

In addition, certain requirements limit the capacity of CDCs operated by the Coast Guard and DOD. For example, for infant care, Coast Guard and DOD require at least one staff member for every four infants with no more than eight infants in a room. Coast Guard and DOD also must meet minimum requirements for square footage of CDCs, both inside and outside (e.g., the playground) as well as other building specifications. (Appendix I describes these and other requirements for center-based care and home-based care established by the Coast Guard, DOD, and the states.)

According to Coast Guard and DOD officials, most CDCs have waitlists, particularly for infant and toddler care as a result of limited capacity and high demand.¹⁴ As of September 2019, the Coast Guard reported having 315 children on waitlists across its nine centers; 69 percent of these children were infants and toddlers.¹⁵ Similarly, as of December 2019, DOD reported having 12,355 children on waitlists across its 761 centers;

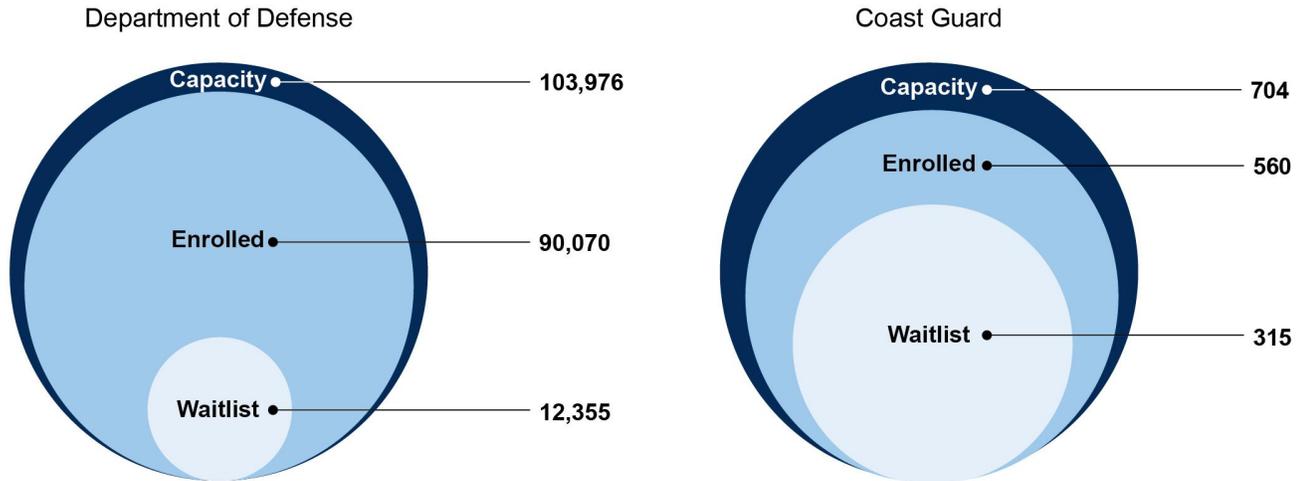
¹³CDC enrollment data include school-age children. Coast Guard officials told us that their CDCs serve very few school-age children in after school programs.

¹⁴In addition to capacity limitations, families might be placed on waitlists for child care depending on their enrollment priority. For example, Coast Guard and DOD prioritize children of service members who are single parents above children of service members who have a non-working spouse. As a result, lower priority families are more likely to be placed on waitlists than higher priority families.

¹⁵We analyzed data from 2019 on child development center and family child care programs which were published in DOD's *Report to the Congressional Defense Committees on Department of Defense Child Development Programs, 2020*. Because of the disruption that the COVID-19 pandemic had on child care services and programs in 2020, we did not review data from that year.

75 percent of these children were infants and toddlers. Figure 2 compares the Coast Guard’s and DOD’s CDC capacity, enrollment, and waitlists.¹⁶

Figure 2: Capacity, Enrollment and Waitlist in Department of Defense (DOD) and Coast Guard Child Development Centers, Including School-Age Care, as of 2019



Source: GAO analysis and summary of Coast Guard and DOD data. | GAO-22-105262.

Accessible Data for Figure 2: Capacity, Enrollment and Waitlist in Department of Defense (DOD) and Coast Guard Child Development Centers, Including School-Age Care, as of 2019

	Department of Defense	Coast Guard
Capacity	103,967	704
Enrolled	90,070	560
Waitlist	12,355	315

Source: GAO analysis and summary of Coast Guard and DOD data. | GAO-22-105262.

Note: Officials reported that infants and toddlers comprise the majority of children on waitlists. A Child Development Center (CDC) may have unused capacity in classrooms designated for older children, but no capacity in classrooms designated for younger children. As a result, a CDC may report that it has unused capacity (for older children) and a waitlist (for younger children).

Compared to other age groups, infants and toddlers require more “hands-on” care (thus, more staff) and need rooms that accommodate their needs, such as diaper-changing and bottle-feeding. CDCs may flex classrooms to care for age groups that have the highest demand. According to Coast Guard and DOD, while newer CDCs are built to ensure that most classrooms are able to serve more than one age group, many older CDCs were not designed to meet the needs of multiple ages

¹⁶In March 2022, Coast Guard and DOD told us they had 361 and 14,034 children, respectively, on CDC waitlists.

and cannot accommodate changing age-group demands. These older CDCs may require replacement or renovation to provide capacity for different age groups needing care. Officials noted that children with disabilities may also need accommodations. (See the text box below for a brief description of the Coast Guard's services for children with disabilities.)

Source: GAO interview with Coast Guard officials and summary of Coast Guard Special Needs Grant and Mutual Assistance Respite Care Program website. | GAO-22-105262

Coast Guard Services for Children with Disabilities

According to Coast Guard officials, its Child Development Centers (CDC) provide services to children with disabilities. Work-Life Family Resource Specialists (Coast Guard personnel who manage the Special Needs Program in the Health Safety and Work Life Office) are required to collaborate with the CDC and the Senior Medical Executive to assess the special needs of children enrolling or enrolled in the CDC to accommodate their unique medical, physical, mental health, or educational needs. Additionally, active duty Coast Guard personnel with a family member diagnosed with a profound disability or serious or terminal illness, who requires ongoing care and attention, and is enrolled in the Coast Guard Special Needs Program may be eligible for the Coast Guard Mutual Assistance Respite Care Program. The program provides a “break” for a few hours (up to a maximum 40 hours per month), to eligible Coast Guard members who have responsibility 24 hours per day to care for a family member with an illness or disability who lives in the same household.

Although waitlists are one indicator of families’ need for child care, waitlists may not accurately represent the total number of additional child care spaces needed.¹⁷ On the one hand, families who prefer CDC child care may decide, before they apply, that the waitlist is too long and seek child care elsewhere; thus, the waitlist might undercount the number of families needing care. On the other hand, if families remain on waitlists after a permanent change of station move or after they no longer need CDC child care, then waitlists might overcount the number of families needing care.¹⁸ Waitlists can also fluctuate based on parental preferences for care, the availability of other community-based child care options, and unit deployment schedules.

Nonetheless, Coast Guard and DOD officials have reported interest in reducing waitlists.

¹⁷Congressional Research Service, *Military Child Development Program: Background and Issues* (Washington, D.C.: March 19, 2020).

¹⁸According to the Coast Guard, families may also enroll their child in care with a community-based provider through a fee assistance program while remaining on a CDC waitlist, if their preference is to receive care through a CDC. As a result, a child who is receiving care through a fee assistance program may also be on a CDC waitlist.

According to Coast Guard officials, as access to universal pre-kindergarten continues to expand across the country, they expect enrollment at CDCs serving preschoolers to decline. In turn, the centers may be able to convert some pre-school rooms into toddler rooms to increase capacity and reduce waitlists. In 2020, DOD reported that nearly half (46 percent) of its CDC waitlists were in four geographic regions: Hawaii; San Diego, California; Norfolk, Virginia; and the National Capital Area.¹⁹ In response, DOD designated these as priority regions and tracks their associated waitlist and enrollment on a quarterly basis. In March 2022, DOD told us that they had also designated San Antonio, Texas as a priority region and that waitlists in the original four priority regions had decreased by about 10 percent since 2020.

Fee Assistance Program

Compared to DOD, a higher percentage of children of eligible Coast Guard personnel receive child care at community-based providers using the Coast Guard's fee assistance program, according to our analysis of agency data.²⁰ The Coast Guard serves 82 percent of children enrolled in its child care programs through community-based providers that participate in its Fee Assistance program, while the DOD serves 16 percent of children in its Fee Assistance programs.²¹ According to Coast Guard officials, due to the dispersed nature of Coast Guard personnel across the country and long waitlists for CDC care, the Fee Assistance program is the most effective way to support its active duty personnel in obtaining affordable child care. Officials told us that the Fee Assistance program serves all active duty personnel who apply; there is no cap on the number of eligible children who may receive care through the program.

While fee assistance is helpful in paying for child care, families enrolled in Fee Assistance programs, like all families seeking child care, may face

¹⁹DOD, *Report to the Congressional Defense Committees*, 2020.

²⁰To be eligible for the Coast Guard's fee assistance program, personnel must be on active duty or a reservist on active duty orders for at least 180 days. If the Coast Guard member is married, his or her spouse must be employed a minimum of 20 hours a week, actively seeking employment, or enrolled in higher-education coursework.

²¹DOD reported that its CDCs enrollment includes 587 children of Coast Guard families as of September 2019; see DOD, *Report to the Congressional Defense Committees*, 2020. The Coast Guard is required to reimburse DOD for Coast Guard children enrolled in DOD child care programs and told us in July 2021, it paid DOD \$1,024,000 in fiscal year 2019.

challenges obtaining child care when there are limited spaces available at community-based providers in their area. For example, according to the Needs Assessment, Coast Guard families reported facing challenges related to a limited supply of community-based child care generally. Among the 25 Coast Guard locations in the Needs Assessment's analysis of child care supply and demand, nine locations were considered "child care deserts," where the supply of child care was only able to serve 33 percent or less of the total number of children from birth to age five.²² Similarly, DOD reported that many military families live in states that have low numbers of licensed providers, and DOD officials told us that families face challenges finding care that meets DOD standards, especially in high-demand and rural areas.²³

According to Coast Guard data, about 80 percent of fee assistance applications are processed within 30 days of acceptance and the remainder within 90 days. Similarly, DOD officials told us that it takes 30 to 90 days to approve DOD families' fee assistance applications.²⁴ As previously mentioned, the Coast Guard has no cap on the number of eligible children who may receive subsidies for care through the Fee Assistance program and there is no waitlist for families applying to enroll in the program. By comparison, DOD officials told us that, as of March 2022, there were waitlists for fee assistance programs administered by the Navy and Marine Corps because of a limited number of community-

²²Those locations were Alameda, California; Astoria, Oregon; Elizabeth City, North Carolina; Honolulu, Hawaii; Ketchikan, Alaska; Los Angeles, California; New London, Connecticut; Petaluma, California; and Valdez, Alaska.

²³Section 1797 of title 10 of the United States Code, requires DOD child development centers to meet standards of operation necessary to be nationally accredited. According to DOD, less than 15 percent of child care centers in the civilian sector are nationally accredited, contributing to difficulties for military families in finding eligible community-based child care. When accredited care is not available, DOD officials told us they may waive this requirement and allow families that receive fee assistance to enroll their children in programs that are state licensed but not nationally accredited. Additionally, in 2019, DOD expanded its Military Child Care in Your Neighborhood (MCCYN) program to include MCCYN-PLUS. MCCYN-PLUS includes child care centers that are quality rated by their state's Quality Rating and Improvement System. According to DOD, utilization of the Quality Rating Improvement System ensures a provider's quality of care is higher than the minimum while acknowledging their progress towards national accreditation. DOD, *Report to the Congressional Defense Committees, 2020*.

²⁴DOD reported that 30 to 90 days is the number of days between when an application is submitted and when the applicant receives fee assistance, and clarified that this is how long it takes families and providers to complete the application and become approved. As of March 2022, the Coast Guard's third-party administrator for its fee assistance program was the U.S. Navy; Child Care Aware of America was the third-party administrator for the fee assistance programs run by the Army, Navy, Air Force, and Marine Corps.

based providers participating in the program, among other reasons. Neither the Army nor the Air Force had waitlists for their fee assistance programs. Moreover, the limited availability of both on-base and community-based care was exacerbated by the COVID-19 pandemic. (See text box for a brief description of the challenges faced by military child care programs associated with the COVID-19 pandemic, as reported by Coast Guard and DOD officials.)

Source: GAO interviews with Coast Guard and DOD officials and Coast Guard documentation. | GAO-22-105262

Reported Challenges Associated with COVID-19 Faced by Military Child Care Programs

Due to the health risk associated with contracting COVID-19, Coast Guard and Department of Defense (DOD) child care providers reduced operating hours, made fewer spaces available, or only serviced mission essential personnel, and some community-based providers have permanently closed. In addition, quarantine requirements and staffing shortages resulted in reduced Child Development Center operating hours and spaces.

DOD officials suggested that the decrease in the number of children served in community-based fee assistance programs may be a result of families choosing to keep their children at home due to increased work from home flexibilities and the closure of community-based providers available during the pandemic. According to both agencies, some Family Child Care providers experienced periodic closures and had to care for their own family members who were exposed to the virus.

The Needs Assessment recommended the Coast Guard conduct a study to examine whether the COVID-19 pandemic exacerbated child care challenges faced by Coast Guard families. Coast Guard officials told us they agreed that it was important to understand these issues and that they would include that information in its next child care needs assessment.

Family Child Care

Coast Guard certified Family Child Care providers have historically helped meet the unique needs of military families, as they can provide care during non-traditional hours. They also can be more accessible for personnel who do not live close to CDCs, such as personnel stationed in

remote or geographically isolated areas, according to Coast Guard officials. However, like DOD, the Coast Guard has experienced a significant decrease in the number of certified Family Child Care providers, which has led to fewer families being able to use this type of care. Coast Guard officials reported that in fiscal year 2019, they had 19 Family Child Care providers, but as of March 2022, they only had five providers serving 20 children, with an additional five providers in process to be approved.

According to the Needs Assessment, Family Child Care providers face many challenges in providing child care, such as high startup costs and the inability to transfer their license to operate from one state to another. To recruit and retain Family Child Care providers, Coast Guard officials said they provide training and support for licensing and supplies, such as play mats, cribs, books, and toys. Additionally, the agency partners with the Coast Guard Foundation to provide 20 grants of up to \$1000 to new Family Child Care providers, which helps cover high startup costs, such as liability insurance. Such insurance can be costly but is required to participate in the program.²⁵ According to Coast Guard officials, when this grant first became available in 2019, it generated some interest from prospective Family Child Care providers, but the overall impact on recruitment of providers was limited because of the challenges associated with COVID-19 faced by providers.

Coast Guard is Working to Increase Access to Quality Child Care by Planning Facility Improvements and Centralizing Information for Families

The Coast Guard plans to build new CDCs and renovate existing ones, which will help provide child care for more families, especially after planned construction efforts are complete. As previously mentioned, because the Coast Guard operates a small number of CDCs, its ability to provide on-base care is limited to about 700 children and, as of March 2022, over 300 children are on CDC waitlists. To address these issues, Coast Guard officials agreed that more families need on-base care—

²⁵The Coast Guard Foundation is a non-profit organization that provides financial support, such as scholarships for higher education, and other products and services to members of the Coast Guard and their families.

especially where more of their personnel are located and where community-based care is limited. In March 2022, the Coast Guard reported to Congress that, between fiscal years 2023 and 2026, it plans to use \$120 million authorized by the Infrastructure Investment and Jobs Act²⁶ to:

- build three CDCs at bases that do not have them: Aviation Training Center, Mobile, Alabama; Astoria, Oregon; and Base Elizabeth City, North Carolina;
- build a CDC to replace the existing one at Base Kodiak, Alaska;
- expand the CDC at Base Alameda, California; and
- refurbish the CDC at Base Cape Cod, Massachusetts.

Figure 3 shows the location of the Coast Guard's CDCs including planned construction, as of March 2022.

²⁶Pub. L. No. 117-58, 135 Stat. 429, 1384-85 (2021). The Infrastructure Investment and Jobs Act authorized \$120 million for the Coast Guard for the construction and improvement of child development centers. The Act states that, no later than 90 days after enactment the Department of Homeland Security must submit a detailed expenditure plan, including a list of project locations, to the Committees on Appropriations and Commerce, Science, and Transportation of the Senate and the Committees on Appropriations and Transportation and Infrastructure in the House of Representatives. Department of Homeland Security. United States Coast Guard. *Procurement, Construction, and Improvements Spend Plan, Fiscal Year 2022 Report to Congress*. (Washington, D.C.: March 15, 2022).

Figure 3: Existing and Planned Coast Guard Child Development Centers (CDC), as of March 2022



Source: GAO analysis of U.S. Coast Guard information; MapInfo (map). | GAO-22-105262

Accessible Data for Figure 3: Existing and Planned Coast Guard Child Development Centers (CDC), as of March 2022

Existing CDC locations:

- Cape Cod, MA
- New London, CT
- Cape May, NJ
- Washington, DC
- Aguadilla, PR
- Bayamon, PR
- Kodiak, AK
- Alameda, CA

-
- Petaluma, CA

Planned CDC locations:

- Astoria, OR
- Elizabeth City, NC
- Mobile, AL

Source: GAO analysis of U.S. Coast Guard information; MapInfo (map). | GAO-22-105262

In addition, the Coast Guard told us that it had additional construction and renovation plans in all of its existing CDCs as shown in Appendix II. The Coast Guard's planned construction and renovation efforts could increase its on-base child care capacity to serve approximately 600 more children. This would bring Coast Guard's total CDC capacity up to 1,300, according to officials. In addition, Coast Guard officials told us they would continue partnering with DOD so that Coast Guard personnel continue to have access to DOD CDCs.²⁷

In addition to increasing CDC capacity, the Coast Guard has centralized and updated online information to help families find child care in their communities. According to the Needs Assessment, Coast Guard families said that they have historically lacked information about local child care providers and "rely upon word-of-mouth and their own internet investigations to find and secure care that meets their needs." To make it easier for eligible Coast Guard personnel to search for child care options and availability, officials told us they began providing access to militarychildcare.com as a centralized search portal for personnel who are looking for community-based care by providers that are approved by the Coast Guard.

In December 2021, Coast Guard officials stated that the Navy, as the administrator of the Coast Guard's Fee Assistance program, created militarychildcare.com accounts for about 1,800 Coast Guard families to

²⁷Since 2003, the Coast Guard and DOD have had a memorandum of agreement to allow personnel to use CDCs operated by both. See also DOD Instruction 6060.02 that ensures Coast Guard personnel have access to DOD child care programs.

enable them to renew their enrollment in the program.²⁸ As of January 2022, officials reported 126 additional families had created accounts, for a total of 1,926 families using the website. Coast Guard officials told us they intend the website to serve as a “one-stop-shop” for families to explore child care options, search for care, request space or to be placed on a waitlist in a child care center, and apply for fee assistance. They also said they plan to use the website so DOD and Coast Guard personnel could request space or be placed on waitlists in Coast Guard CDCs or with Coast Guard-approved Family Child Care providers consistent with a recommendation in the Needs Assessment.

To help make child care more affordable for families, especially those in high-cost areas, the Coast Guard increased Fee Assistance subsidy amounts for personnel who earn less. Before 2019, subsidies were based on total family income and did not consider that most Coast Guard personnel (84 percent) live in high-cost areas. Officials told us that in 2019 the Coast Guard increased the subsidy amounts paid to providers and based these amounts on personnel paygrade, market caps for high-cost and basic-cost areas, and whether care is full-time or part-time.²⁹ See Table 3.

²⁸DOD created the website militarychildcare.com in 2015 for families to find information about child care services, submit requests for care, and be placed on CDC wait lists. As of March 2021, DOD had expanded use of the website to include fee assistance programs for the Navy and Marine Corps and planned to include the Air Force’s program. Plans to include the Army’s fee assistance program were still to be determined. See GAO, *Military Child Care: Potential Costs and Impacts of Expanding Off-Base Child Care Assistance for Children of Deceased Servicemembers*, [GAO-22-105186](https://www.gao.gov/products/GAO-22-105186) (Washington, D.C.: Dec. 14, 2021).

²⁹The Coast Guard changed how it calculated subsidy amounts in 2019 when it determined that most subsidies were paid to personnel who earned more. The Coast Guard made this determination when it transitioned administration of the program from the Department of Agriculture to the Navy. Also, by comparison, DOD’s fee assistance subsidies are determined by total family income. In fiscal year 2022, DOD plans to standardize and raise the monthly provider rate caps across all service branches’ fee assistance programs.

Table 3: Amounts Paid to Community-Based Providers for Full-Time Child Care in High-Cost Areas, Per Month Per Child, as of November 2020

Coast Guard Paygrade ^a	Minimum Amount Paid by Parent ^b	Maximum Amount Paid by Coast Guard
E1, E2, E3	\$250	\$950
E4	\$300	\$900
E5	\$350	\$850
E6, O1	\$400	\$800
E7, O2, O1E	\$525	\$675
E8, O2E	\$575	\$625
E9, W2, O3	\$625	\$575
O4, W3, O3E	\$675	\$525
O5, O6, W4	\$725	\$475

Source: GAO summary of Coast Guard information | GAO-22-105262

Note: According to Coast Guard officials, fee assistance subsidies are subject to a market cap (\$1,200 for full-time care, or \$600 for part-time care, per month per child in a high-cost area; \$900 for full-time care, or \$450 for part-time care per month per child in a basic-cost area).

^aCoast Guard paygrades eligible for Fee Assistance include: Enlisted (E-1 through E-9), Warrant Officers (W-2 through W-4), and Officers (O-1 through O-6 and O1E through O3E).

^bMinimum parent fees for part-time care are one-half the amount for full-time care. Full-time care is care provided over 25 hours per week; part-time care is less than 25 hours per week.

Coast Guard's Past Agreements with Community-Based Child Care Providers

Coast Guard officials told us they have, in the past, entered into agreements with community-based providers to provide care for children of Coast Guard personnel. For example, officials told us that one such agreement was in place in 2011 (or possibly earlier) with a local YMCA on a Coast Guard base in California. However, that agreement is no longer in place because, according to the Coast Guard, the YMCA could not maintain staffing to continue to provide care. Also, officials told us the Coast Guard does not currently have staff capacity to manage these types of direct agreements with community-based providers.

Source: GAO summary of Coast Guard information. | GAO-22-105262

According to Coast Guard officials, these changes have been successful in increasing the amount of funds available to and used by personnel who earn less. Nevertheless, the Needs Assessment found that the rising cost of child care nationwide was still among the most formidable challenges Coast Guard families face, and is particularly challenging for single parents and for parents with infants or multiple children. Accordingly, the Needs Assessment recommended that the Coast Guard not only continue the Fee Assistance program but also expand the pool of providers that may participate in the program, such as kinship caregivers (i.e., family members and friends). In response, Coast Guard officials told us they agreed with this recommendation, but noted they do not have the legislative authority to subsidize care provided by friends and family members.

While the Coast Guard plans to continue its Family Child Care program, officials said they have struggled to recruit and retain providers willing to provide such care. Coast Guard officials told us that the program can meet targeted needs, such as providing care for personnel who work early mornings, late nights, or on weekends. They also said that as independent contractors, providers are responsible for managing all aspects of their child care operation and for certain costs, such as liability insurance.³⁰

The Needs Assessment recommended that the Coast Guard expand the Family Child Care program, particularly in areas where there is a limited number of quality child care providers—such as in remote or geographically isolated areas—or in areas where the population demands

³⁰See also Kamarck, *Military Child Development Program*, pp. 26-27, which discusses benefits and limitations of DOD Family Child Care programs.

are too great to be met by center-based care alone. However, Coast Guard officials disagreed with the recommendation, explaining that, while the Family Child Care program could help address gaps in child care experienced by some personnel, they have found that providers have been willing to provide this care only on occasion. They said they believed the best use of their limited resources was to focus on building additional CDCs and growing the Fee Assistance program to increase access to care for more families. However, Coast Guard officials acknowledged that their approach regarding the Family Child Care program could result in families in remote or geographically isolated areas struggling to find child care. They noted that they will continue to try to recruit providers into the program and plan to certify additional providers by June 2022.

Agency Comments

We provided a copy of this report to the Department of Homeland Security and DOD for review and comment. The Department of Homeland Security provided technical comments that we incorporated as appropriate. DOD did not comment on this report.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, the Secretary of Defense, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact Kathryn Larin at (202) 512-7215 or larink@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Kathryn A. Larin
Director,
Education, Workforce, and Income Security Issues

Appendix I: Selected Child Care Requirements

The tables below include selected requirements for Coast Guard and DOD child development centers and family child care providers as well as similar information on state requirements. We selected requirements within each topic (e.g., staffing) that generally addressed the same or similar specific requirement (e.g., caregiver-to-child ratios). We reviewed Coast Guard and DOD requirements from agency documentation and state requirements from documentation from the Department of Health and Human Services. GAO did not independently review state requirements included in this appendix; instead, we relied on analysis from the National Center on Early Childhood Quality Assurance as noted below each table.¹

Table 4: Selected Coast Guard, Department of Defense (DOD), and State Requirements for Child Care Centers

Category	Topic	Requirements
Staffing: Caregiver-to-Child Ratios	Coast Guard	Minimum caregiver to child ratios for child development centers and preschools are as follows: Birth to 12 months 1:4 12 to 24 months 1:5 24 months to 3 years 1:7 3 to 5 years 1:12 5 years and older 1:15
Staffing: Caregiver-to-Child Ratios	DOD	DOD established the same ratios as the Coast Guard. Also, during nap time, the staff-to-child ratios for children over 24 months of age may increase to twice the non-napping staff-to-child ratio.

¹National Center on Early Childhood Quality Assurance information is based on a review of regulations posted in the National Database of Child Care Licensing Regulations that were in effect as of December 31, 2017.

Appendix I: Selected Child Care Requirements

Category	Topic	Requirements
Staffing: Caregiver-to-Child Ratios	States	The most common caregiver-to-child ratios states require are as follows: Six weeks 1:4 11 months 1:4 18 months 1:6 35 months 1:8 3 years 1:10 4 years 1:10 5 years 1:15 10 years 1:15
Space and furnishings: Indoor and Outdoor Square Footage	Coast Guard	The Coast Guard requires that child care centers provide at least 35 square feet of indoor space per child and 75 square feet of outdoor space per child.
Space and furnishings: Indoor and Outdoor Square Footage	DOD	Indoor: The square footage of activity space per child must meet the requirements of the Unified Facilities Criteria or Service specifications for facilities built after 2002. ^a A minimum of 50 square feet per child of activity space must be provided for infants in facilities built prior to 2002. Outdoor: The square footage of playground space per child must meet the requirements of the Unified Facilities Criteria or Service specific guidelines. The playground area must be able to support 30 percent of the total capacity of the child development center in a center of 100 or more children, and all the children in centers with a capacity of fewer than 100 children.
Space and furnishings: Indoor and Outdoor Square Footage	States	The most common provisions for child care centers require 35 square feet of indoor space per child and 75 square feet of outdoor space per child.
Safety: Immunizations	Coast Guard	No child will be admitted to a child care center without current, age-appropriate immunizations against tetanus, diphtheria, whooping cough (pertussis), poliomyelitis, and hepatitis B. No child 15 months or older will be admitted without current immunizations against measles, mumps, and rubella. There are no exceptions unless a physician explains in writing why it is medically indicated. A waiver for an immunization exemption may be granted for medical or religious reasons. A statement from the child's health care provider is required if an immunization may not be administered because of a medical condition.
Safety: Immunizations	DOD	Children enrolling in or currently enrolled in DOD child development programs must provide written documentation of immunizations appropriate for the child's age. A waiver for an immunization exemption may be granted for medical or religious reasons. A statement from the child's health care provider is required if an immunization may not be administered because of a medical condition.
Safety: Immunizations	States	All states require children to have immunizations to enroll in a center. Thirty-four states allow physicians to provide a written statement for exemption from immunizations for medical need.

Appendix I: Selected Child Care Requirements

Category	Topic	Requirements
Curriculum: Developmental Activities	Coast Guard	All child development centers shall be accredited by the National Association for the Education of Young Children (NAEYC). ^b According to the NAEYC, accredited programs implement a curriculum that is consistent with its goals for children and promotes learning and development in each of the following areas: social, emotional, physical, language, and cognitive. NAEYC and the NAEYC Accreditation system do not prescribe a specific curriculum; programs can design their own or choose a commercially available curriculum that meets NAEYC’s guidelines.
Curriculum: Developmental Activities	DOD	Eligible child development program facilities (excluding Family Child Care) shall be accredited by a DoD-approved national accrediting body.
Curriculum: Developmental Activities	States	The research brief does not address accreditation but does provide information on developmental activities child care centers should provide to children. Specifically: Forty-nine states specify the types of activities—such as outdoor play, active play, quiet play, naptime, and group activities—that must be included in children’s daily schedules. Forty-two states specify that the domains of children’s development must be addressed in activities. Most of these states require centers to address children’s social, physical, language and literacy, cognitive and intellectual, and emotional development.
Allowable Care Hours: Operating Hours	Coast Guard	Coast Guard requires directors of child development centers to establish operating hours. Directors coordinate with base commanders to set operating hours that best support the base, according to agency officials. For example, the child development center located at Base Kodiak is open from 7:00 AM to 5:00 PM.
Allowable Care Hours: Operating Hours	DOD	DOD requires installation commanders to set child care centers operating hours, which are generally 6:00 AM to 6:00 PM. Installation commanders may modify operating hours to help meet the needs of families and mission requirements.
Allowable Care Hours: Operating Hours	States	Requirements for operating hours vary across the states.

Sources: U.S. Coast Guard. Commandant Notice 1754. Effective March 21, 1997. U.S. Department of Defense. Instruction 6060.2. Effective September 1, 2020. National Center on Early Childhood Quality Assurance (March 2020). Research Brief #1: Trends in Child Care Center Licensing Requirements and Policies for 2017, Office of Child Care: Washington, D.C. | GAO-22-105262.

Note: GAO did not independently review state requirements included in this table; rather, we relied on analysis from the National Center on Early Childhood Quality Assurance, Trends in Child Care Center Licensing Requirements and Policies for 2017. NCECQA information is based on a review of regulations posted in the National Database of Child Care Licensing Regulations that were in effect as of December 31, 2017.

^aThe Unified Facilities Criteria are technical manuals and standards used for planning, design, construction, restoration and maintenance of DOD facility projects. The Unified Facilities Criteria include a core group of 27 standards that apply to building systems found in most DOD facility construction projects, and include standards such as architecture, roofing, and civil engineering.

^bNAEYC is a professional membership organization that promotes high-quality early learning for all young children, birth through age 8, by connecting early childhood practice, policy, and research.

Appendix I: Selected Child Care Requirements

Table 5: Selected Coast Guard, Department of Defense (DOD), and State Requirements for Family Child Care Providers

Category	Topic	Requirements
Staffing: Caregiver-to-Child Ratios	Coast Guard	<p>A single Family Child Care provider may care for a maximum of six children in the home, including the provider's own children under the age of 8. A maximum of 12 children may be cared for if two approved caregivers are present.</p> <p>The total number of children cared for cannot exceed the maximum established by state or local regulations.</p> <p>No more than two children under the age of 2 (only one of these two children under 2 months of age) may be cared for by a single provider in a home. (Exceptions shall be considered on a case-by-case basis.)</p>
Staffing: Caregiver-to-Child Ratios	DOD	<p>The maximum group size in a home is six children per provider, including the provider's own children under the age of 8.</p> <p>When all children are under the age of 2, the maximum group size at any one time is three.</p> <p>In mixed-age groups, the number of children under 2 years of age is limited to two children.</p>
Staffing: Caregiver-to-Child Ratios	States	<p>Of the 44 states that license family child care homes:</p> <p>11 states allow no more than six children in the home.</p> <p>13 states allow six preschool children plus additional school-age children.</p> <p>These states allow from two to six additional school-age children in care during before- and after-school hours or during school vacations. Most allow three or four additional children. In a few states, an additional adult is needed when additional school-age children are in care.</p> <p>10 states allow 10 or more preschool-age children in the home.</p>
Space and furnishings: Indoor and Outdoor Square Footage	Coast Guard	<p>There shall be adequate indoor space (at a minimum of 35 net square feet per child) for the number of children receiving care.</p>
Space and furnishings: Indoor and Outdoor Square Footage	DOD	<p>There is adequate space indoors and outdoors in the home for the number of children in care to play, rest, and eat.</p>
Space and furnishings: Indoor and Outdoor Square Footage	States	<p>The most common provisions require 35 square feet of indoor space per child and 75 square feet of outdoor space per child.</p>
Safety: Immunizations	Coast Guard	<p>Immunizations: All immunizations must be current.</p>
Safety: Immunizations	DOD	<p>Immunizations: All immunizations must be current.</p>
Safety: Immunizations	States	<p>Of the 44 states that license Family Child Care providers, 43 require children to have immunizations to enroll in Family Child Care-provided care.</p>

Appendix I: Selected Child Care Requirements

Category	Topic	Requirements
Curriculum: Developmental Activities	Coast Guard	The Coast Guard does not have a requirement that providers use a specific curriculum; but it does say that the provider shall offer activities and experiences that enhance the children’s physical, social, emotional, creative, and intellectual well-being.
Curriculum: Developmental Activities	DOD	DOD does not have a requirement that providers use a specific curriculum; but it does say that activities and experiences are provided daily that enhance children’s physical, social, emotional, and cognitive development.
Curriculum: Developmental Activities	States	<p>The Research Brief does not state whether states have requirements regarding whether Family Child Care providers must use curricula. However, it does state that: Thirty-eight states specify the types of activities—such as outdoor play, active play, quiet play, naptime, and group activities—that must be included in children’s daily schedules.</p> <p>Twenty-nine states specify that the domains of children’s development must be addressed in activities. Most of these states require Family Child Care providers to address children’s social, physical, language and literacy, cognitive and intellectual, and emotional development.</p> <p>Twenty-five states have requirements for the types of equipment and materials Family Child Care providers must have for children, such as indoor and outdoor gross-motor equipment, fine-motor manipulatives, books and other literacy materials, and art supplies.</p>
Allowable Care Hours: Operating Hours	Coast Guard	The Coast Guard does not specify when the provider shall provide care, but it does state that the provider must inform parents of the operating hours.
Allowable Care Hours: Operating Hours	DOD	DOD does not have a requirement regarding allowable care hours for providers.
Allowable Care Hours: Operating Hours	States	There is no comparable requirement for operating hours across the states.

Sources: U.S. Coast Guard. Commandant Notice 1754. Effective March 21, 1997. U.S. Department of Defense. Instruction 6060.2. Effective September 1, 2020. National Center on Early Childhood Quality Assurance (March 2020). Research Brief #2: Trends in Family Child Care Home Licensing Requirements and Policies for 2017, Office of Child Care: Washington, D.C. | GAO-22-105262.

Note: GAO did not independently review state requirements included in this table; rather, we relied on analysis from the National Center on Early Childhood Quality Assurance, Trends in Family Child Care Home Licensing Requirements and Policies for 2017. NCECQA information is based on a review of regulations posted in the National Database of Child Care Licensing Regulations that were in effect as of December 31, 2017.

Appendix II: Coast Guard Efforts to Construct and Renovate Child Development Centers

As of April 2022, the Coast Guard reported it had completed or was in the process of completing several renovation projects in its child development centers (CDCs) and planned to construct new CDCs. See Table 6.

Table 6: As of April 2022, Status of Coast Guard’s Efforts to Construct and Renovate Child Development Centers (CDCs), According to the Coast Guard

CDC	Year built	Project(s)	Project Status
Alameda, California	1994	Replace carpets in all classrooms with resilient flooring	In process
Alameda, California	1994	Expand CDC	Planned
Astoria, Oregon	To be determined	Construct new CDC	Planned
Borinquen, Puerto Rico	1953	Construct new CDC to replace existing CDC	In process
Cape Cod, Massachusetts	1957	Replace the playground and abate asbestos and lead-based paint hazards	Completed
Cape Cod, Massachusetts	1957	Refurbish existing CDC	Planned
Cape May, New Jersey	1991	Replace and repair playground fencing	Completed
Cape May, New Jersey	991	Replace flooring and paint interior	In process
Elizabeth City, North Carolina	To be determined	Construct new CDC	Planned
Kodiak, Alaska	1986	Repair and paint all interior walls and replace carpeted area with resilient flooring	Completed
Kodiak, Alaska	1986	Construct new CDC to replace existing CDC	Planned
Mobile, Alabama	To be determined	Construct new CDC	Planned
National Capital Region	2013	Playground upgrade requested but not yet funded ^a	Planned
Petaluma, California	2010	Construct new CDC to replace existing CDC	In process
San Juan, Puerto Rico	1997	Install new flooring and cabinets in the infant room	In process
U.S. Coast Guard Academy	1994	Replace the infant and pre-toddler playground	Completed

Source: GAO summary of Coast Guard information | GAO-22-105262.

^aThis CDC was built and is operated by the General Services Administration (GSA) and is within a GSA facility. All maintenance and repairs are the responsibility of GSA.

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Nora Boretti (Assistant Director), Jay Palmer (Analyst in Charge) and Tracie Sánchez made significant contributions to this report. Also contributing to this report were Andrew Bellis, Lilia Chaidez, Christopher Conrad, Aimée Elivert, Margaret Hettinger, Kristen Jones, Skye Kwong, Theresa Lo, Heather MacLeod, Kim Mayo, Jean McSween, Danielle Novak, Karissa Robie, Kim Seay, Joy Solmonson, and Curtia Taylor.

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